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**Federal Communications Commission**

COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

WASHINGTON, D. C. 20554

In the Matter of )  
 )  
Amendment to the Commission's ) IB Docket No. 95-41  
Regulatory Policies Governing )  
Domestic Fixed Satellites and )  
Separate International )  
Satellite Systems )

To: The Commission

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**COMMENTS OF  
WESTINGHOUSE BROADCASTING COMPANY (GROUP W)**

Westinghouse Broadcasting Company ("Group W"), hereby submits its comments in response to the Commission's Notice of Proposed Rulemaking ("Notice"), FCC 95-146, released April 25, 1995, proposing ". . . to treat all U.S.-licensed geostationary fixed-satellites under a single regulatory scheme." Notice, ¶1.

Group W, through its Group W Satellite Communications and Group W Network Services Divisions, operates a large earth station complex in Stamford, Connecticut, serving customers globally. The facility provides an extensive range of video production, program origination and related satellite uplinking and downlinking distribution services on both a domestic and international basis.

In addition, Group W has recently entered into a joint venture arrangement providing for the construction and operation of a similar comprehensive facility in the Republic of Singapore. This facility, to be constructed at

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a cost of over \$25 million, will provide video and related satellite distribution services in the rapidly growing southeast Asia market.

From both standpoints, Group W is quite familiar with the rapidly growing globalization of the satellite telecommunications marketplace. We fully agree with the tentative conclusion expressed in the Notice that ". . . the public interest would be best served by modifying . . . [FCC satellite licensing] policies to reflect the global nature of the telecommunications needs today." Notice, ¶17.

Specifically, Group W supports the Commission's proposals to eliminate the present transborder policy and modify the separate systems policy to permit both domestic and international satellite system operators licensed by the FCC to compete on an equal basis. Given the present maturity and competitive nature of the satellite marketplace, domestic satellite operators should be able to provide international services on the same basis as international separate system licensees. By the same token, international separate system licensees should be able to provide the same range of domestic services that are provided by domestic system operators.

From the earth station operator's standpoint, having the widest available options of service from the widest

possible number of space segment providers will best serve the diverse and changing requirements of customers. In this global age, Group W is experiencing an increasing customer demand for services which involve both domestic and international components. At times, it is difficult to distinguish where one component ends and the other takes up.

For example, Group W routinely handles live feeds of PGA Golf matches for NHK of Japan. The U.S. feed from the originating point is transmitted by domestic satellite to Group W's Stamford earth station complex where Japanese language commentary and other Japanese material is added. The resulting Japanese language program is then uplinked live via domestic satellite to a west coast earth station where it is again uplinked via international satellite to NHK in Tokyo. The program is then uplinked to a Japanese broadcast satellite for transmission to viewers. Overall, two U.S. domestic satellites, one international satellite and a Japanese domestic broadcast are used to deliver the program live to the viewer. Furthermore, Group W Network Services' Business Television unit often will simultaneously feed important business conference information and other announcements of interest to both domestic and European locations for corporate business clients.

As reflected in the Notice, the transborder and separate systems policies were fashioned at a time when different satellite service marketplaces existed, having different regulatory and policy implications. In Group W's view, that is no longer the case. As summarized in the Notice:

"Permitting all operators to provide the widest range of service offerings technically feasible and consulted by Intelsat will permit them to use their satellites more efficiently and to provide innovative and customer-tailored services. This should, in turn, benefit consumers by increasing service options, lowering prices, and facilitating the creation of a global information infrastructure." Notice, ¶21.

Group W further supports the Commission's proposal to modify earth station licensing policies to reflect the merger of domestic and international satellite space segment regulation. Specifically, Group W supports the Commission's proposal to broaden the meaning of the "ALSAT" designation to encompass all U.S. licensed fixed satellites, including separate international systems. Effectively, this would permit the licensed teleport operator to use all current and future U.S. licensed fixed satellites to the extent authorized under international arrangements, without the need for time-consuming license modifications when utilization of a new international satellite is desired.

Under current procedures, this process can now take up to three months, given the need for public notice of the application under the procedures of Section 309(d) of the Communications Act.

The Notice further raises the question of the manner in which frequency coordination with terrestrial users should be handled for stations operating in the 4/6 GHz C Band. As the operator of several C Band earth stations, Group W fully appreciates and supports the need for careful frequency coordination with terrestrial users to permit the maximum utilization of the band for both terrestrial and satellite use. However, this does not mean that a time-consuming license modification application need be filed every time access to a new satellite in the 4/6 GHz band is desired. Rather, Group W suggests that access to the new satellite be allowed immediately upon certification or notification to the Commission (including, if deemed necessary by the Commission, a copy of the completed coordination study) that appropriate frequency coordination procedures have been successfully completed. This will permit the rapid utilization of new satellites, while at the same time

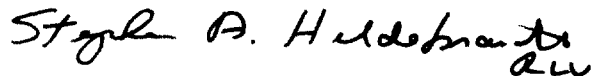
avoiding unnecessary and time-consuming license modification applications.

Respectfully submitted,

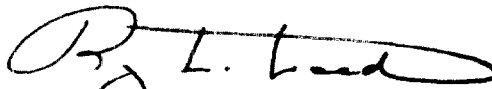
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June 8, 1995